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Attorney for Nancy Pua

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	No. CR-06-00030-JSW
	)	
Plaintiff,	)	STIPULATION AND <del>PROPOSED</del> ORDER
	)	TO CONTINUE MATTER TO JANUARY
Vs.	)	11, 2007 FOR CHANGE OF PLEA, OR
	)	MOTIONS & TRIAL SETTING
NANCY PUA, et al.	)	
	)	
Defendants.	)	
	)	
	)	
	)	

Defendants Nancy Pua and Johnny Lee Tan, by and through their attorneys, Steven F. Gruel and Shana Keating, respectfully, request that the status hearing scheduled for November 30, 2006 at 2:30 p.m. be rescheduled to January 11, 2007, at 2:30 p.m. for change of plea, or motions and trial setting. This request is predicated on the fact that the remaining defendants have now had the opportunity to review much more discovery since the last appearance before Your Honor and are in a better position to convey to the Court the likely direction of the case.

Specifically, the parties have begun discussions regarding a global resolution of the case by way of plea agreements. It is believed that the additional time to January 11, 2007 would

STIPULATION AND ~~PROPOSED~~ ORDER TO  
CONTINUE MATTER TO JANUARY 11, 2007  
FOR CHANGE OF PLEA, OR MOTIONS & TRIAL SETTING

The parties concur that the time between November 30, 2006 to January 11, 2007 should be excluded under the Speedy Trial Act pursuant to 18 U.S.C. Section 3161(h)(8)(B)(iv) (time to prepare) and 18 U.S.C. Section 3161(h)(3)(B)(8)(A)&(B)(ii) (the case has been declared complex and the ends of justice outweigh the best interest of the public and defendants in a speedy trial).

DATED: 11/28/06

DATED: 11/28/06

DATED: 11/28/06

\_\_\_\_\_/s/\_\_\_\_\_  
KYLE WALDINGER  
Assistant United States Attorney

- 2

~~PROPOSED~~ ORDER CONTINUING MATTER

PREDICATED on the above stipulation and GOOD CAUSE APPEARING, the Court continues this matter to January 11, 2007 at 2:30 p.m. for change of plea or for motions and trial setting.

The parties concur, and the Court finds, that the time between November 30, 2006 to January 11, 2007 is excluded under the Speedy trial Act pursuant to 18 U.S.C. Sections 3161(h)(8)(B)(iv) (time to prepare) and 18 U.S.C. Section 3161(h)(3)(B)(8)(A)&(B)(ii) (the case has been declared complex and the ends of justice outweigh the best interest of the public and defendants in a speedy trial).

IT IS SO ORDERED.  
November 29, 2006

  
JEFFREY S. WHITE  
U.S. District Court Judge

STIPULATION AND ~~PROPOSED~~ ORDER TO  
CONTINUE MATTER TO JANUARY 11, 2007  
FOR CHANGE OF PLEA, OR MOTIONS & TRIAL SETTING